

**MORGAN, LEWIS & BOCKIUS LLP**

(A Pennsylvania Limited Liability Partnership)

502 Carnegie Center

Princeton, New Jersey 08540-7814

Thomas A. Linthorst (239302017)

Carlyle W. Edwards-Balfour (242942017)

Phone: (609) 919-6600

Fax: (609) 919-6701

thomas.linthorst@morganlewis.com

carlyle.edwards-balfour@morganlewis.com

*Attorneys for Defendant Societe Generale  
Americas*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TZVI KLEIN, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

PHYTON TALENT ADVISORS LLC and  
SOCIETE GENERALE AMERICAS,

Defendants.

Civil Action No.: 3:21-cv-12171-MAS-LHG

**STIPULATION TO TRANSFER CASE,  
GRANT LEAVE TO FILE AN  
AMENDED COMPLAINT, AND TO  
SET TIME FOR DEFENDANTS TO  
ANSWER, MOVE, OR OTHERWISE  
RESPOND TO THE AMENDED  
COMPLAINT**

*Document Electronically Filed*

IT IS HEREBY STIPULATED AND AGREED TO by and between Plaintiff Tzvi Klein (“Plaintiff”), Defendant Phyton Talent Advisors LLC (“Defendant Phyton”), AND Defendant Societe Generale Americas (“Defendant SocGen”) and (collectively “Defendants”) through their undersigned counsel, as follows:

WHEREAS, on June 4, 2021, Plaintiff filed a Collective Action Complaint in the above-captioned action alleging violations of the Fair Labor Standards Act of 1938 (“FLSA”), the New Jersey Wage and Hour Law (“NJWHL”), the New Jersey Law Against Discrimination (“NJLAD”), and the New Jersey Conscientious Employee Protection Act (“CEPA”) (ECF No. 1);

WHEREAS, on August 31, 2021 Defendants each filed a motion to transfer Plaintiff's Complaint to the United States District Court for the Southern District of New York ("SDNY") and to dismiss (ECF Nos. 13 and 14);


WHEREAS, on October 18, 2021, Plaintiff filed an Opposition to Defendants' motions and, in doing so, did not oppose the transfer of the matter to SDNY, cross-moved for leave to amend his Complaint, and opposed the Defendants' motions in part based on new facts alleged in the Proposed Amended Complaint (ECF No. 21);

**THEREFORE, IT IS HEREBY ORDERED**, that:

1. Plaintiff is granted leave to amend the Complaint by filing the Proposed Amended Complaint attached to the Opposition (ECF No. 22-1).
2. The above-captioned matter be transferred to the United States District Court for the Southern District of New York.
3. The parties will file correspondence with the transfer court requesting a briefing schedule.

**IT IS SO ORDERED:**

Dated: November 5, 2021

  
The Honorable Michael A. Shipp  
United States District Judge